

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE NASHVILLE DIVISION**

JANE DOE, alias,

Plaintiff,

v.

DYLAN CHRISTOPHER ADLER,

Defendant.

3:23-CV-00197

ANSWER

1. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 1, and therefore demands strict proof of same.

2. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 2, and therefore demands strict proof of same.

3. Admit.

4. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 4, and therefore demands strict proof of same.

5. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 5, and therefore demands strict proof of same.

6. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 6, and therefore demands strict proof of same.

7. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 7, and therefore demands strict proof of same.

8. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 8, and therefore demands strict proof of same.

9. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 9, and therefore demands strict proof of same.

10. Admit.

11. Admit.

12. Defendant admits that plaintiff consented to the photographing and recording of said activities. Defendant denies the remaining averments of Paragraph 12, and therefore demands strict proof of same.

13. Deny.

14. Admit.

15. Deny.

16. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 16, and therefore demands strict proof of same.

17. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 17, and therefore demands strict proof of same.

18. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 18, and therefore demands strict proof of same.

19. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 19, and therefore demands strict proof of same.

20. Admit.

21. Deny.

22. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 22, and therefore demands strict proof of same.

23. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 23, and therefore demands strict proof of same.

24. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 24, and therefore demands strict proof of same.

25. Admit.

26. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 26, and therefore demands strict proof of same.

27. Deny.

28. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 28, and therefore demands strict proof of same.

29. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 29, and therefore demands strict proof of same.

30. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 30, and therefore demands strict proof of same.

31. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 31, and therefore demands strict proof of same.

32. Deny.

33. Defendant does not have any such digital imaging or recording in his possession.

34. Defendant does not have any such information in his possession.

35. Defendant does not have any such material in his possession.

36. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 36, and therefore demands strict proof of same.

37. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 37, and therefore demands strict proof of same.

38. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 38, and therefore demands strict proof of same.

39. Deny.

40. Deny.

41. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 41, and therefore demands strict proof of same.

42. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 42, and therefore demands strict proof of same.

43. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 43, and therefore demands strict proof of same.

44. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 44, and therefore demands strict proof of same.

45. Deny.

46. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 46, and therefore demands strict proof of same.

47. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 47, and therefore demands strict proof of same.

48. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 48, and therefore demands strict proof of same.

49. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 49, and therefore demands strict proof of same.

50. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments of Paragraph 50, and therefore demands strict proof of same.

51. Deny.

52. All allegations of the complaint not heretofore admitted, denied, or explained and/or otherwise treated here and above are hereby expressly denied as though set forth verbatim, and strict proof is demanded if deemed material by the Court.

WHEREFORE, defendant prays plaintiff's complaint be dismissed with costs attached to the plaintiff. In the alternative, defendant demands a jury of twelve (12) persons to try this cause and for such other, further, and general relief this Court deems just and appropriate.

Respectfully submitted,

KELLAR, JOHNSON & PAYNE
An Association of Attorneys

/s/ Gary M. Kellar

Gary M. Kellar, Esq., BPR# 016170
1300 Division Street, Suite 300
Nashville, Tennessee 37203
(615) 988-9850 – Telephone
(615) 988-8112 – Direct
(615) 988-9847 – Facsimile
gkellar@kellarjohnsonpayne.com

The Nesheiwat Law Group, PLLC

/s/ Daniel Nesheiwat by Gary M. Kellar w/ express permission

Daniel Nesheiwat, Esq., BPR# 036142

1224-B Columbia Ave, Suite 110

Franklin, TN 37064

(615) 903-9888 – Telephone

(615) 903-9899 – Facsimile

daniel@neshlawgroup.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, and properly addressed to:

DONOVAN K. VASEK, BPR# 034474

VASEK & ROBBINS, PLLC

103 West Main Street

Lebanon, Tennessee 37087

(615) 549-8909

dvasek@vrlawtn.com

Attorneys for Plaintiff

this 29th day of November, 2023.

/s/ Gary M. Kellar

Gary M. Kellar